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June 13, 2025

VIA ECF

Honorable Brian R. Martinotti, U.S.D.J.
United States District Court
District of New Jersey
U.S. Post Office & Courthouse
2 Federal Square
Newark, NJ 07102

Re: *In re: Insulin Pricing Litigation*, No. 2:23-md-03080-BRM-RLS
MDL No. 3080 | Bi-weekly status report

Dear Judge Martinotti:

Pursuant to CMO #5, the parties provide the following status update for the weeks ending June 6 and June 13.

1. The PBM Defendants' oppositions to Plaintiffs' Motion to Compel Responses to Compass Lexecon Subpoena to Produce Documents were filed on May 30, 2025. Plaintiffs' reply is being filed today, June 13, 2025. Oral argument has been requested.
2. Defendants provided Plaintiffs with edits to the deposition protocol on February 7, 2025. On April 4, 2025, Plaintiffs sent Defendants their collective edits to the draft deposition protocol. Defendants continue to review Plaintiffs' draft and are working on a collective set of edits.
3. Puerto Rico filed a motion for leave to amend its complaint. Defendants are preparing their opposition.
4. The parties continue to meet and confer regarding various discovery issues.

Thank you for your continuing attention to this matter.

Respectfully submitted,

/s Matthew F. Gately
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Liaison Counsel for
Class Action Track

/s David R. Buchanan
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cc: Honorable Rukhsanah L. Singh, U.S.M.J.
All counsel of record